

REMARKS/ARGUMENTS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and the following reasons. By way of this Amendment and Reply, Claims 1, 13, 14, 26, 33, 42, and 52 have been amended to incorporate elements similar to those from Claims 6, 19, and 29. Claims 6, 19, and 29 have been canceled. No new matter has been added by way of these amendments. Claims 1-5, 7-18, 20-28, 30-34, and 42-61 will be pending in this application upon entry of this Amendment and Reply.

I. Allowable Subject Matter

On page 22 of the Office Action, Claims 6, 19, and 29 were objected to as being dependent on a rejected base claim, but were indicated as being allowable if rewritten in independent form. By this Amendment and Reply, Claims 1, 14, and 26 have been amended in accordance with the Examiner's suggestion and Claims 6, 19, and 29 have been canceled. Remaining independent Claims 13, 33, 42, and 52 have been similarly amended. Accordingly, Applicants submit that all claims are in condition for allowance.

II. Claim Rejections Under 35 U.S.C. § 103(a)

On page 2 of the Office Action, Claims 1-34 and 42-61 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,763,157 to Williams et al. (hereinafter "Williams '157") in view of U.S. Patent No. 6,614,949 to Williams et al. (hereinafter "Williams '949"). As discussed above, independent Claims 1, 13, 14, 26, 33, 42, and 52 have been amended and are believed to be in condition for allowance (along with their associated dependent claims).

Independent Claim 1 has been amended to recite, in part, that "the grouping trench extends completely through the common substrate" (emphasis added). Amended independent Claims 13, 26, 33, and 52 recite similar elements. Independent Claim 14 has been amended to recite, in part, that "the group is ... separated from other groups by at least one grouping trench that extends completely through the common substrate." Independent Claim 42 recites, in part,

“the grouping trench extends from the first side of the common substrate through the common substrate to a second side of the common substrate opposite the first side of the common substrate.” Applicant respectfully submits that Williams ‘157 and Williams ‘949 fail to disclose, teach, or suggest such elements.

On page 3 of the Office Action, the Examiner acknowledged that Williams ‘157 fails to disclose, teach, or suggest a “grouping trench.” To cure the deficiencies of Williams ‘157, the Examiner asserted on page 3 of the Office Action that Williams ‘949 teaches a “grouping trench [that] extends into a common substrate.” On page 12 of the Office Action, the Examiner further stated that “grouping trenches are formed between epoxy hardener material 70 in Figure 5 [of Williams ‘949] within electro-optical elements 66 are formed.”

However, Williams ‘949 fails to disclose, teach, or suggest a “grouping trench [that] extends completely through the common substrate,” as recited in Claims 1, 13, 26, 33, and 52, or that “the group is ... separated from other groups by at least one grouping trench that extends completely through the common substrate,” as recited in Claim 14, and that “the grouping trench extends from the first side of the common substrate through the common substrate to a second side of the common substrate opposite the first side of the common substrate,” as recited in Claim 42. Indeed, the Examiner appeared to acknowledge as much in stating that Claims 6, 19, and 29 (which recited that “the grouping trench extends completely through the common substrate”) include allowable subject matter.

In view of the above, Applicant respectfully submits that amended, independent Claims 1, 13, 14, 26, 33, 42, and 52 and their respectively associated dependent claims are patentable over Williams ‘157 and Williams ‘949. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection of Claims 1-34 and 42-61 under 35 U.S.C. § 103(a).

* * *

It is submitted that each outstanding objection and rejection to the Application has been overcome, and that the Application is in a condition for allowance. Applicant respectfully requests consideration and allowance of all pending claims.

It should also be noted that although arguments have been presented with respect to certain claims herein, the recited subject matter as well as various other subject matter and/or combinations of subject matter may be patentable for other reasons. Further, the failure to address any statement by the Examiner herein should not be interpreted as acquiescence or agreement with such statement. Applicant expressly reserves the right to set forth additional and/or alternative reasons for patentability and/or allowance with the present Application or in any other future proceeding, and to rebut any statement presented by the Examiner in this or other papers during prosecution of the present Application.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present Application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this Application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by the credit card payment instructions in EFS-Web being incorrect or absent, resulting in a rejected or incorrect credit card transaction, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extension of time is needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. § 1.136 and authorizes payment of any such extension fee to Deposit Account No. 19-0741.

Respectfully submitted,

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